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17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 CHARMAINE CHUA, ET AL.

20 PLAINTIFFS,

21 VS.

22 CITY OF LOS ANGELES, ET AL.,

23 DEFENDANTS.

24 CASE No: 2:16-cv-00237-JAK-GJS(x)
25 [HON. JOHN A. KRONSTADT]

26 SUPPLEMENTAL SUBMISSION RE:
27 ADMINISTRATION OF CLASS CLAIMS

28 HEARING DATE: SEPTEMBER 9, 2019

HEARING TIME: 8:30 A.M.

COURTROOM: 10B

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1 Plaintiffs hereby provide updated information on the anticipated costs
2 of administration of the class claims in this matter. As the Court is aware,
3 Plaintiffs proposed that the class notice and claims be handled by Plaintiffs'
4 counsel to reduce the costs of administration. The basis for the in-house proposal
5 was counsels' belief that, given the size of the class and the fact that they already
6 had access to current information for the majority of the class and could, therefore,
7 administer the settlement at less cost in house.

8 In the motion for preliminary approval, Plaintiffs' counsel requested \$20,000
9 for the administration of the class claims. Plaintiffs' counsel now believes that
10 notice and fulfillment can be accomplished at considerably less cost and requests
11 that the Court approve the \$20,000 as a cap, rather than a flat cost item.

12 In anticipation of the hearing on Plaintiffs' motion for preliminary approval
13 of the settlement, the undersigned counsel compiled a database of all class
14 members, using the redacted booking list from the Defendant. This list of putative
15 class members arrested at 6th and Hope was then cross-referenced with contact lists
16 maintained by the class representatives, as well as information collected by
17 Plaintiffs' counsel at the first criminal court appearance for the class members.

18 Using this list, Plaintiffs' counsel recently emailed the putative class
19 members. Only 7 of 71 emails were returned as undeliverable and three of those
20 have been updated. Plaintiffs believe that they have current contact information for
21 82 of the 125 class members. Two of the 127 arrestees brought their own lawsuits,
22 bringing the total to 125 people in the class. Utilizing date of birth and last known
23 addresses from the booking reports, current contact information for nearly all of
24 the remaining 43 class members will be available at a small cost to an outside firm.

25 Plaintiffs now anticipate that they distribution of the notice and relevant
26 claims materials for the vast majority of putative class members, and potentially
27 for all but a few, can be accomplished by email and through the website created for
28

1 the class. There will be minimal costs for printing and postage, as well as reduced
2 labor costs if the notice is done in this manner.

3 Plaintiffs propose that the Court approve the previously requested \$20,000
4 flat fee as a cap, with \$45 an hour as the compensation rate for support staff time
5 to administer class claims. The undersigned spent approximately three (3) hours to
6 date supervising this process and communicating with class members. At present,
7 Plaintiffs intend to bill only for the time incurred by support staff in administering
8 and processing claims; however, if additional time is necessary to respond to
9 objections and other issues that arise, counsel's time may be billed. To date,
10 Plaintiffs incurred approximately 25 hours to create the basic website, database,
11 input class member information from various sources and email putative class
12 members to update on the case and the upcoming motion for preliminary approval.

13 It now appears that, based on the foregoing, it is unlikely that staff time for
14 the claims process will exceed 200 hours and may well be less. Out-of-pocket
15 costs are unlikely to exceed \$1,500, including costs related to the website, postage,
16 photocopying and printing. No cost is anticipated for publication of the notice
17 because all class members are already known and Plaintiffs believe current contact
18 information is available for nearly all. This estimate also assumes that, given the
19 make-up of the class, most will participate in the claims process digitally.
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21 Dated: Sept. 5, 2019 Respectfully submitted,

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23 **KAYE, McLANE, BEDNARSKI & LITT**
24 **LAW OFFICE OF CAROL SOBEL**
25 **SCHONBRUN, SEPLOW, HARRIS & HOFFMAN**

26 By: /s/ Carol A. Sobel
27 CAROL A. SOBEL
28 Attorneys for Plaintiffs